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HARMON MEDICAL REHABILITATION

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

WILLIAMS, KRYSTAL,  
Plaintiff,

vs.

HARMON MEDICAL  
REHABILITATION a THI of NV  
Corporation,  
Defendant.

Case No. 2:13-cv-02332- RCJ-NJK

~~[PROPOSED]~~ STIPULATION AND  
ORDER EXTENDING DISCOVERY

[FIRST REQUEST]

Pursuant to Local Rules 6-1 and 26-4, Defendant Harmon Medical Rehabilitation ("Defendant"), more correctly identified as THI of Nevada at Las Vegas I, LLC dba Harmon Medical and Rehabilitation Center, by and through its undersigned counsel, and Plaintiff Krystal Williams ("Plaintiff") in proper person, hereby stipulate to amend the Discovery Plan and Scheduling Order (**Dkt. #14**) by extending the outstanding discovery deadlines for a period of ninety (90) days. This is the first request for an extension to the discovery plan and scheduling order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. Further, the parties' request for an extension of the outstanding discovery deadlines is subject to the good cause standard as it is brought before the Court more than 21 days prior to the expiration of the discovery cutoff deadline, which is currently set for July 25, 2015.

1           **A.       DISCOVERY COMPLETED TO DATE**

2           Defendant has produced initial disclosures pursuant to Federal Rule of Civil Procedure  
3 26(a)(1). Plaintiff has also produced initial disclosures. Defendant has propounded its First Set of  
4 Interrogatories and Requests for Production of Documents on Plaintiff. Defendant also issued a  
5 FOIA request to the U.S. Equal Employment Opportunity Commission and a response has been  
6 received.

7           **B.       DISCOVERY THAT REMAINS TO BE COMPLETED**

8           Plaintiff's responses to Defendant's First Set of Interrogatories and Requests for Production  
9 of Documents are due June 17, 2015. Plaintiff intends to propound interrogatories and requests for  
10 production of documents to Defendant and to notice depositions of witnesses listed in Defendant's  
11 Initial Disclosures. Defendant intends to take Plaintiff's deposition. Finally, based on the  
12 testimony taken at deposition, the parties anticipate the possibility of serving additional follow up  
13 written discovery requests.

14           **C.       REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

15           This extension is necessary to allow both parties ample time to complete all appropriate  
16 discovery. The parties initially experienced difficulties communicating with one another, but those  
17 issues appear to be resolved. Additional time is, therefore, needed to complete written discovery  
18 and issue and receive responses to third-party subpoenas before the deposition phase of discovery  
19 can begin.

20           Additional time is also needed because the Early Neutral Evaluation conference ("ENE")  
21 was only recently scheduled by the Court and has been set for August 26, 2015 (**Dkt. #22**).  
22 Accordingly, the ENE has been scheduled for a date well after the current discovery cutoff  
23 deadline of July 25, 2015. The parties wish to participate in the ENE in keeping with the spirit of  
24 that program, *i.e.*, before expending significant time and resources on discovery and depositions.  
25 The parties believe that, absent any unforeseen circumstances, all necessary discovery can be  
26 accomplished by the requested extended deadline in the event the matter is not resolved at the ENE  
27 conference.  
28

**D. PROPOSED SCHEDULE**

The parties stipulate and agree that:

1. **Discovery**: The discovery period shall be extended ninety (90) days from July 25, 2015 to **October 23, 2015**.

2. **Dispositive Motions**: The deadline to file dispositive motions shall be extended up to and including **November 23, 2015**, thirty (30) days after the proposed discovery deadline.

3. **Pre-Trial Order**: If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint Pretrial Order shall be filed 30 days after the date set for filing dispositive motions, and therefore not later than **December 23, 2015**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court. The disclosures required by Federal Rules of Civil Procedure 26(a)(3), and any objections thereto, shall be included in the pretrial order as required by LR 26-1(e)(6).

This stipulation and order is sought in good faith and not for the purpose of delay. No prior request for any extension of scheduling deadlines has been made.

Dated: June 24, 2015

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Respectfully submitted,

Respectfully submitted,

/s/ Krystal Williams

/s/ Crystal J. Herrera

KRYSTAL WILLIAMS

BRUCE C. YOUNG, ESQ.  
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LITTLER MENDELSON, P.C.

Pro Se Plaintiff

Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

**ORDER**

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_ June 24 \_\_\_\_\_, 2015.

  
UNITED STATES MAGISTRATE JUDGE